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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al., individually
and on behalf of all other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC

Defendants.

Case No. 3:20-cv-4688-RS

**STIPULATION EXTENDING TIME TO
RESPOND TO SECOND AMENDED
COMPLAINT AND [PROPOSED] ORDER**

Judge: Hon. Richard Seeborg
Court: Courtroom 3 – 17th Floor

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”) and Defendant Google LLC (“Google”), hereby stipulate to the extension of the deadline for Google to file its Answer to Plaintiffs’ Second Amended Complaint by twenty-one (21) days, from September 1, 2021 up to and including September 22, 2021.

Google and Plaintiffs (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree to the following:

WHEREAS, on June 11, 2021 Plaintiffs filed their Second Amended Complaint for (1) Breach of Contract; (2) Invasion of Privacy Act Violations, Cal. Penal Code § 631; (3) Violations of the Comprehensive Computer Data Access and Fraud Act (“CDAFA”), Cal. Penal Code § 502 *et seq.* (4) Invasion of Privacy; (5) Intrusion Upon Seclusion;

WHEREAS, on June 25, 2021 Google filed a Motion to Dismiss Second Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(6), and in the Alternative, Motion to Strike Pursuant to Fed. R. Civ. P. 12(f);

WHEREAS, on August 18, 2021 Hon. Richard Seeborg issued an Order Granting in Part and Denying in Part [Google’s] Motion to Dismiss and ordered that any amended complaint must be filed within 14 days of issuance of that Order;

WHEREAS, pursuant to Fed. R. Civ. P. 12(a)(4)(A), Google’s deadline to file an Answer to Plaintiffs’ amended complaint lands on the same day as Plaintiffs’ deadline to amend their Second Amended Complaint.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that Google’s deadline for filing an Answer to Plaintiffs’ Second Amended Complaint is September 22, 2021.

DATED: August 31, 2021

By: /s/ Mark C. Mao

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Attorneys for Plaintiffs

DATED: August 31, 2021

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Attorneys for Defendant Google LLC

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: August 31, 2021

WILLKIE, FARR & GALLAGHER LLP

/s/ Benedict Y. Hur

Benedict Y. Hur

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al., individually and
on behalf of all other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC

Defendants

Case No. 3:20-cv-4688-RS

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that Google's deadline for filing an Answer to Plaintiffs' Second Amended Complaint is September 22, 2021.

IT IS SO ORDERED.

Dated: _____

The Honorable Richard Seeborg